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and NextEra Energy Partners, L.P.*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Bankruptcy Case
No. 19-30088 (DM)
Chapter 11
(Lead Case) (Jointly Administered)

PG&E CORPORATION,

-and-

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

**STIPULATION BETWEEN NEXTERA
ENTITIES AND AD HOC COMMITTEE
OF SENIOR UNSECURED
NOTEHOLDERS EXTENDING TIME
TO RESPOND TO MOTION OF THE AD
HOC COMMITTEE OF SENIOR
UNSECURED NOTEHOLDERS TO
TERMINATE THE DEBTORS'
EXCLUSIVE PERIODS PURSUANT TO
SECTION 1121(d)(1) OF THE
BANKRUPTCY CODE**

Re: Dkt. No. 2741

[No Hearing Requested]

1 This stipulation (“**Stipulation**”) is entered into by NextEra Energy, Inc. and NextEra
2 Energy Partners, L.P. (collectively, “**NextEra**”), on the one hand, and the Ad Hoc Committee of
3 Senior Unsecured Noteholders (the “**Noteholders Committee**”), on the other. NextEra and the
4 Noteholders Committee are referred to in this Stipulation collectively as the “**Parties.**”

5 A. On July 11, 2019, the Noteholders Committee filed the *Motion of Ad Hoc*
6 *Committee of Senior Noteholders to Terminate the Debtors’ Exclusive Periods Pursuant to*
7 *Section 1121(d) of the Bankruptcy Code* [Dkt. No. 2741] (the “**Motion to Terminate**
8 **Exclusivity**”), which is set for a hearing before the Court at 9:30 a.m. on July 24, 2019. Any
9 response or opposition to the Motion to Terminate Exclusivity is due by 4:00 p.m. (Pacific Time)
10 on July 17, 2019.

11 B. Counsel for NextEra has requested, and counsel for the Noteholders Committee has
12 agreed, that the time for NextEra to respond to the Motion to Terminate Exclusivity be extended.
13

14 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
15 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT IS HEREBY**
16 **STIPULATED AND AGREED AS FOLLOWS, BY AND AMONG THE PARTIES,**
17 **THROUGH THEIR UNDERSIGNED COUNSEL, AND THE PARTIES JOINTLY**
18 **REQUEST THE COURT TO ORDER THAT:**

19 1. The time for NextEra to file and serve any response or opposition to the Motion to
20 Terminate Exclusivity is extended through 4:00 p.m. (Pacific Time) on July 18, 2019.

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22 [Signature page follows.]
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1 DATED: July 12, 2019

/s/ David M. Stern

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14 -and-

/s/ Ashley Vinson Crawford

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